



RE: FCC Notice of Proposed Rule Making - Docket 10-153

In the top 50 broadcast markets, the broadcast auxiliary services bands at 6.875-7.125 and 12.7 – 13.2 GHz are crowded to the point that frequency coordination is difficult at best. It is not unusual for Part 74 users to seek relief by filing applications in the 5.9 – 6.4 GHz band, and in some cases, resorting to unlicensed spectrum in the 5.8 GHz range, where no frequency protection is offered, but a means to an end is sorely needed. In the remaining markets, usage is high to medium. The statement made on page 9, in paragraph 16 of FCC 10-146 relative to the use of the 12700-13200 MHz by cable systems as being "used mostly by less urban and smaller systems" completely ignores the heavy broadcast use in metro and urban areas for STL (TS), ICR (TI), and portable (TP) operation. The on-going conversion of LPTV and translator stations to ATSC will tax these frequencies even more over then next two to four years with hundreds of new LPTV STL and TV Translator Relay filings.

Typical Part 74 operations are asymmetrical nature, with many installations having one primary STL frequency but several ICR frequencies converging on one site from different directions. The ICR frequencies serve as downlinks from ENG news pickup sites. Most of these downlinks remain wideband analog due to the constraints of the recent BAS relocation program, which did not address these links regarding digital conversion.

The T/R spacing currently used in these bands is based on local conditions; does not follow any standard plan; and can never be expected to due to the asymmetry noted above. Broadcast users and their coordinators are well aware of this issue and have developed local agreements that work well. Frequency conservation and re-use is an amiable and desirable pursuit, and always an objective for current users, however attempts to coordinate new FS users in numerous channel bandwidths using rigid T/R spacing will be frustrating at best, and will lead to a substantial increase in interference at worst. Paragraph 17 of FCC 10-146 proposes coordination for new FS, CARS, and BAS stations using the Commissions current frequency coordination procedures; however these procedures do not address current equipment and technology.

Finally, broadcast users in these bands are still rebuilding their networks to complete the digital conversion. An influx of new users and channel plans at this point in time seriously jeopardizes the successful this effort.

We respectfully urge the Commission to dismiss this NPRM in its entirety.

Sincerely,

George Maier

George Maier – President
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